

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

---

**IN RE: JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION:**

**MDL NO. 2738 (FLW) (LHG)**

**SECTION “N” (5)**

**JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H. GOODMAN**

**THIS DOCUMENT RELATES TO:  
The cases listed in the attached Exhibit A**

**EX PARTE MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

COMES NOW Plaintiffs in the attached Exhibit A, by and through her undersigned attorneys Richard L. Root and Betsy J. Barnes, both of the Morris Bart, LLC firm, who respectfully request that Richard L. Root be withdrawn as counsel, and that Betsy J. Barnes be substituted as Lead Counsel on all civil actions and plaintiffs identified on the attached Exhibit A.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays the Court will allow the withdrawal and substitution of counsel, as set forth herein.

Dated: November 7, 2022

Respectfully Submitted:

/s/ Richard L. Root  
Richard L. Root

/s/ Betsy J. Barnes  
Betsy J. Barnes

Morris Bart, LLC  
601 Poydras Street 24th Floor New  
Orleans, LA 70130  
(504) 525-8000 Phone  
(833-277-4214 Fax  
bbarnes@morrisbart.com  
rroot@morrisbart.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 7, 2022, the foregoing Joint Motion to Withdraw and Substitute Counsel was electronically filed and served using the CM/ECF system which will send notification of such filing to all attorneys in this matter who are registered users of the CM/ECF system.

/s/ Richard L. Root